

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

MIKEAL WOODEN-OUSLEY,

*Plaintiff,*

-VS-

CITY OF CHICAGO,  
DETECTIVE JULIE MENDEZ,  
P.O. JOSEPH CORONA,  
and P.O. OSCAR SERRANO,

*Defendants.*

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)  
) No. 08 CV \_\_\_\_  
)  
) (*jury demand*)  
)  
) **FILED: JUNE 12, 2008**  
) **08CV3381**  
) **JUDGE GRADY**  
) **MAGISTRATE JUDGE NOLAN**  
) **AEE**

# COMPLAINT

Plaintiff, by counsel, alleges as follows:

1. This is a civil action arising under 42 U.S.C. §1983. The jurisdiction of this Court is conferred by 28 U.S.C. §1343 and 28 U.S.C. §1367.
2. Plaintiff Mikeal Wooten-Ousley is a resident of the Northern District of Illinois.
3. Defendants Detective Julie Mendez and Police Officers Joseph Corona and Oscar Serrano were at all times relevant acting under color of their authority as police officers of the City of Chicago; each is sued in her (or his) individual capacity.
4. Defendant City of Chicago is an Illinois municipal corporation joined in this action pursuant to 28 U.S.C. §1367.
5. On June 12, 2006, plaintiff was arrested by defendants Corona and Serrano.

6. Defendants Corona and Serrano did not have a lawful basis to arrest plaintiff.
7. Thereafter, defendant Mendez caused plaintiff to be charged with several criminal offenses.
8. Defendant Mendez did not have a reasonable basis to cause plaintiff to be charged with any criminal offense; she caused plaintiff to be charged with several offenses by withholding exculpatory evidence from the prosecutor and from a grand jury.
9. Plaintiff remained in custody until May of 2008 when he was found not guilty by a jury.
10. The above described actions of defendants Corona and Serrano caused plaintiff to be subjected to a false arrest, contrary to rights secured by the Fourth Amendment.
11. The above described actions of defendant Mendez caused plaintiff to have been deprived of rights secured by the Fourth and Fourteenth Amendments to the Constitution of the United States and to have been subjected to the Illinois tort of malicious prosecution.
12. As a result of defendants' wrongful acts, plaintiff lost his job and his liberty for nearly two years.
13. Plaintiff demands trial by jury.

WHEREFORE plaintiff prays that judgment be entered against defendants jointly and severally in an amount in excess of one hundred thousand dollars as compensatory damages.

/s/ Kenneth N. Flaxman

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KENNETH N. FLAXMAN  
ARDC No. 830399  
200 South Michigan Avenue  
Suite 1240  
Chicago, Illinois 60604-2430  
(312) 427-3200 (phone)  
(312) 427-3930 (fax)  
knf@kenlaw.com  
*attorney for plaintiff*